

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SMITH KLINE & FRENCH LABORATORIES,
LTD, and SMITHKLINE BEECHAM CORP.,
d/b/a GLAXOSMITHKLINE,

Plaintiffs,

Civil Action No. 05-197 (GMS)

v.

TEVA PHARMACEUTICALS USA, INC.,

Defendant.

STIPULATION AND PROPOSED ORDER

WHEREAS plaintiffs Smith Kline & French Laboratories, Ltd. and SmithKline Beecham Corp., d/b/a GlaxoSmithKline (collectively “Plaintiffs”) and defendant Teva Pharmaceuticals USA, Inc. collectively seek and jointly request to extend the discovery deadlines set forth below. This extension is for the limited purpose of addressing discovery requests and deposition notices that were outstanding as of May 31, 2006, and

WHEREAS, in order to facilitate the just, speedy, and inexpensive determination of the litigation, the parties have agreed to extend certain dates that impact discovery between the parties but that do not impact the Court's schedule or any other dates or deadlines set by the Court.

NOW, THEREFORE, IT IS STIPULATED AND AGREED, subject to the approval and order of the Court, that:

1. The deadline by which the parties shall complete Fact Discovery is extended through and including June 30, 2006.

2. The deadline by which the parties shall exchange Opening Expert Reports on issues for which the parties have the burden of proof is extended through and including July 10, 2006.

3. The deadline by which the parties shall exchange Answering Expert Reports is extended through and including August 14, 2006.

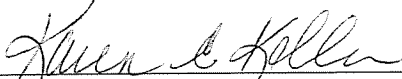
4. The deadline by which the parties shall exchange Reply Expert Reports is extended through and including September 1, 2006.

5. The deadline by which the parties shall complete Expert Discovery will remain September 27, 2006, as set forth in the Scheduling Order (D.I. 17).

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SO ORDERED this _____ day of _____, 2006.

United States District Judge